

**DRAFT BACKGROUND DOCUMENT A
Data Accuracy and Completeness Discussion**

This draft background document summarizes background information regarding data accuracy and completeness issues related to (1) the frozen OTIS data and State verification process and (2) inspection data source comparisons. Note, the terms State and DEC are used interchangeably.

This draft background document is subject to further updating, revisions and clarifications based on additional information, reviews and feedback, including DEC feedback.

I. Frozen OTIS data and State verification process

The following part summarizes anomalies that were identified with the frozen OTIS data that was used in the SRF's OTIS metrics analyses and that had been subject to DEC's review and evaluation during the State verification process of the pre-frozen OTIS data set.

The discussion focuses on data accuracy and completeness in ICIS-NPDES and OTIS regarding Metrics 5a1, 5b1, 5b2, 7d1, 7f1, 7h1, and 8a2. No data accuracy or completeness issues were identified in regard to Metric 7a1. The sole facility identified in Metric 10a is accurate but in the context of the Metric 10a's focus, the facility is not applicable to the metric because the referenced enforcement action was completed by EPA, not DEC.

For context, the frozen State-verified data published in the OECA OTIS data metrics analysis for Federal Fiscal Year (FY) 2012 contained Phase IV oil and gas permits in the data sets' universes and related counts. The State did not receive administrative authority or jurisdiction over Phase IV until October 31, 2012. Accordingly, Phase IV permits should not be included in the SRF universe and related counts. The Phase IV data anomalies are identified in the specific metric discussions below.

Metric 5a1 - Inspection Coverage of NPDES Majors. The frozen OTIS universe of 58 facilities includes 10 Phase IV facilities.

EPA conducted a review of State-generated inspection summary charts that are a part of the DEC mid-year and end-of-year Performance Partnership Grant (PPG) submissions for Calendar Years (CYs) 2011 and 2012. *See* Background Document A, Part II. This review was undertaken in effort to identify non-stormwater DEC-lead APDES permit inspections that appear in DEC-generated PPG APDES inspection submissions but that do not appear in the frozen OTIS data sets for Metrics 5a1, 5b1 and 5b2.

In regard to Metric 5a1, DEC's PPG submissions indicate that it inspected at least 11 major facilities in FY 2012 that do not appear in the frozen OTIS data set for Metric 5a1. *See* Background Document A, Part II.B.

Metric 5b1 - Inspection Coverage of NPDES Non-Majors with Individual Permits. The frozen OTIS universe of 32 facilities contains eight Phase IV facilities and three MS4s. The CWA Metrics Plain Language Guide (PLG) states that Metric 5b1 does not include wet weather inspections such as CSO, SSO or stormwater inspections.

Metric 5b2 - Inspection Coverage of NPDES Non-Majors with General Permits. The frozen OTIS universe of 5572 facilities includes 78 Phase IV facilities, 193 construction stormwater general permit (CGP) coverages and 97 multi-sector stormwater general permit (MSGP) coverages. The frozen OTIS count of 61 inspections includes 19 CGP inspections and 24 MSGP inspections. The CWA PLG states that Metric 5b2 does not include wet weather inspections such as CSO, SSO or stormwater inspections.

DEC's PPG submissions indicate that it inspected at least 12 non-major facilities with general permit coverage in FFY 2012 that do not appear in the frozen OTIS data set for Metric 5b2. *See* Background Document A, Part II.B.

In regard to DEC's inspection reporting in ICIS, EPA's review in Background Document A, Part II, compares DEC-generated inspection results from DEC's February 15 2013 Compliance Monitoring Strategy (CMS) Plan with an EPA ICIS inspection data pull for Calendar Years (CY) 2011-2012. The review identified 14 major facilities that were apparently DEC-lead inspections in CYs 2011-2012 but that do not appear in the EPA May 29, 2013 ICIS Data Pull for CYs 2011-2012.

Metric 7d1 - Major Facilities in Noncompliance. The frozen OTIS universe contains seven Phase IV permits and the Red Dog Mine permit. The frozen OTIS facility count also includes four Phase IV permits and the Red Dog Mine permit. In accordance with the 2008 Memorandum of Agreement between EPA and the State, the Red Dog Mine permit did not come under the State's administrative authority or jurisdiction until December 2012.

Metric 7f1- Non-Majors in Category1 Noncompliance. The frozen OTIS count of 13 facilities includes seven Phase IV facilities.

Metric 7h1 - Non-Majors in Category 2 Noncompliance. The frozen OTIS count of 23 facilities includes seven Phase IV facilities.

Metric 8a2 - Major Facilities in SNC. The frozen OTIS universe of 62 facilities contains four ICIS-identified terminated permits and 10 Phase IV facilities.

The State reports that the incomplete entry of inspections into ICIS-NPDES is caused, in part, by back-logs and delays in completing inspection reports and resulting delays in reporting completed inspections to the State's data entry team. The State has not identified other causes of verification inaccuracies (e.g., other non-applicable permits as identified in the CWA PLG in data sets' universes and counts).

II. Inspection Data Source Comparisons

The following part summarizes two inspection data source comparisons regarding the DEC APDES compliance and enforcement program's completed inspections:

- DEC 2013 CMS Plan with EPA May 2013 ICIS data pull; and
- DEC Inspection Summary Charts with frozen OTIS data;

A. DEC 2013 CMS Plan Comparison with EPA May 2013 ICIS Data Pull

The information in the table below represents major facilities that DEC identified in its February 15, 2013 CMS Plan [Table 1, APDES Majors] as apparently DEC-lead inspections in either CY 2011 or CY 2012 but that *do not* appear in the EPA May 29, 2013 ICIS Data Pull for CYs 2011-2012.

This comparison was made on a two year *calendar* basis.

Note, DEC's Table 1 in its 2013 CMS Plan did not contain the following three major APDES facilities: (1) Teck Red Dog Port Site – AK0040649; (2) Cordova POTW – AK0021547; and (3) Northern Pacific Seafoods – AKG528434.

APDES Permit No.	Facility
AK0021245	Homer POTW
AK0021377	Kenai POTW
AK0021890	Seward POTW
AK0020036	Soldotna POTW
AK0000272	Alyeska Seafoods Inc.
AKG520491	Trident – Cordova South
AKG520476	Trident - Petersburg
AKG520494	Ocean Beauty - Cordova
AKG528493	Ocean Beauty
AKG520101	Polar Seafoods - Seward
AKG520042	Seahawk Seafoods - Valdez
AKG520488	Icicle Seafoods - Seward
AKG520065	Sitka Sound Seafoods
AKG528833	Trident - Kodiak

B. DEC Inspection Summary Chart Comparison with Frozen OTIS Data

The information in the two tables below represents a review of DEC-generated inspection summary charts that are a part of the DEC mid-year and end-of-year PPG submissions for CYs 2011 and 2012. The information in the two tables below represents a comparison of non-stormwater DEC-lead APDES permit inspections that appear on DEC-generated PPG submissions but that *do not* appear in the frozen OTIS data sets for Metrics 5a1, 5b1 and 5b2. This comparison is being made on the FY 2012 basis. The inspection dates are derived from the DEC-generated PPG inspection summary charts.

Major APDES-Permitted Facilities

APDES Permit No.	Facility	DEC Inspection Date
AKG520065	North Pacific Seafoods	June 7, 2012
AKG520101	Seafood Producers Corp	June 8, 2012
AKG520476	Trident – Petersburg	June 29, 2012
AKG520491	Trident Cordova South	July 31, 2012
AKG520494	Ocean Beauty – Cordova	August 1, 2012
AKG520042	Silver Bay Seafoods	August 17, 2012
AKG528825	West. AK Fisheries – Kodiak	Sept. 18, 2012
AKG528493	Ocean Beauty – Kodiak	Sept. 20, 2012
AK0021555	Kodiak POTW	Sept. 21, 2012
AKG520488	Icicle Seafoods – Seward	Sept. 26, 2012
AK0021245	Homer POTW	Sept. 27, 2012

Minor APDES-Permitted Facilities (excluding stormwater AKR05 and AKR10)

APDES Permit No.	Facility	DEC Inspection Date
AKG571055	Kaktovik POTW	Jan. 5, 2012
AKG570006	BP Prud Bay Ops Center	April 25, 2012
AKG520132	Trident Ketchikan Frz. Plt.	May 10, 2012
AKG570547	Silver Bay Seafoods – Sawmill Cove	June 4, 2012
AKG520500	Tonka Seafoods – Petersburg	June 29, 2012
AKG570013	Grande Denali Lodge	July 2, 2012
AKG570017	Denali Princess Lodge	July 2, 2012
AKG570037	Denali Grizzly Bear Cabins	July 3, 2012
AKG570073	Haliburton Energy Services	July 11, 2012
AKG520524	Copper Riv. Seaf. – Cordova	August 2, 2012
AKG370391	Stein Gilmore Crk. Mine Site	Sept. 6, 2012
AKG520412	SassCo Taku Fisheries	Sept. 17, 2012